



February 22, 2021

Mrs. Cristina Haworth, AICP  
Issaquah Planning Consultant  
City of Issaquah  
1775 12<sup>th</sup> Ave. NW  
Issaquah, WA 98027

Project: Issaquah High School #4 and Elementary School #17, AHBL No. 2180412.10  
Subject: Response to Comments dated 12/21/2020

Dear Cristina:

This letter is in response to your comments dated 12/21/2021, regarding the above referenced project. The comments are included below (verbatim) for your reference. Our responses are shown in **bold** after each comment.

#### Administrative Adjustments of Standards

1. AAS for Wall Screening. AAS20-00011 is a request to deviate from wall screening requirements set forth in IMC 18.12.135. Pursuant to IMC 18.07.480(E)(14), school projects in the CF-F zone must comply with the *Central Issaquah Design and Development Standards* (CIDDS) Chapter 10.0, Landscape. The landscaping standards in IMC 18.12 do not apply to this project. The requirements for blank walls and retaining walls in CIDDS section 10.9 apply.

CIDDS section 10.9 requires retaining walls over four feet in height to comply with the landscaping and screening requirements and provides a range of options. The City determined that an AAS is not required for wall screening complying with this section. Please note that the application will require information demonstrating a decorative wall treatment will be used.

**Response: We request that our AAS for Wall Screening be withdrawn based on determination from City that it is not required. The revised site plan has been laid out to maximize landscape screening of walls using existing and proposed vegetation where possible. In areas where it is not possible to provide screening the project will use decorative wall treatments. For Segmental block retaining walls a decorative block pattern from manufacturer's available selection will be chosen. Example images of this is shown on sheet L1.9 of the attached plans.**

2. AAS for FAR. AAS20-00012 is a request to reduce the minimum required Floor Area Ratio (FAR). The application includes a plan with noted deductions from gross site area to determine the developable site area but does not explain how each area is

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Structural Engineers

Landscape Architects

Community Planners

Land Surveyors

Neighbors

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determined to be eligible as a deduction. Please provide a narrative description or similar information explaining the rationale behind each deduction item.

Your narrative should describe how deductions meet the language in Table 18.07.480 Footnote 7, which states that “FAR reduction may be requested, if needed, for operational functions at the direction of the Designated Official.... For schools, *operational functions include outdoor space that is used for required academic curriculum*; for example track and field areas.” (Emphasis added.)

Pursuant to our meeting on December 17, 2020, please provide an itemized narrative description demonstrating how each element you are proposing to be deducted is consistent with the definitions for “operation function” and “required academic curriculum:”

- “Operational functions” means “functions necessary for and related to Issaquah School District’s Mandate or purpose for being.”
- “Academic curriculum” means “the lessons and academic content taught in a school.”

Please refer to my email dated December 17, 2020 (sent 9:34AM) for additional information on how these definitions were derived. You may consider including some background information on how requirements for academic programming are established.

Your narrative should consider how each operational function you are proposing to deduct is used for is used for *required academic curriculum*, not just an operational function. You should also consider approval criteria set forth in IMC 18.07.480(E)(19).

**Response: Included with the resubmittal documents is a revised AAS for the FAR reduction. Note based on additional meetings and discussions with the City the comments above are not valid based on additional research of the FAR requirements and reduction criteria. This documentation utilizes community space to meet the minimum FAR area allowed by an AAS reduction.**

3. AAS for Modification of Tree Retention Requirements. CIDDS section 10.13(B) establishes criteria to modify the applicable tree retention requirements. Review of this request must occur through an Administrative Adjustment of Standards application. Please submit the required application, including the narrative addressing the criteria in CIDDS 10.13(B).

*NOTE: If you agree the AAS discussed in comment no. 1, above, is not required because the project will comply with wall screening requirements in CIDDS, the application fees may be able to be reallocated to this required tree retention AAS. Please contact the City prior to submitting the tree retention AAS if you intend to request this.*

**Response: The application for the AAS for Modification Tree Retention Requirements will be submitted under separate cover with the responses to the arborist report.**



4. AAS for Shared Parking. The application included a request for shared parking for the schools and the stadium special events. Shared parking request must be reviewed through an Administrative Adjustment of Standards application. Please submit the required application, including the narrative addressing shared parking provisions and the parking study supporting the request.

**Response: The application for the AAS for Shared Parking has been submitted under separate cover.**

#### Site Development Permit

5. Comprehensive Plan Narrative. The information submitted with the application does not adequately address the consistency with Issaquah's Comprehensive Plan. IMC 18.04.430(A)(1) establishes Comprehensive Plan consistency as criterion of approval. Please submit a narrative describing the project's consistency with the Comprehensive Plan, making specific references to goals and/or policies describing how the project is consistent with and supports them.

*NOTE: Pursuant to IMC 18.07.660(F)(1), consistency with the Comprehensive Plans is also required for the MSP. Submit the narrative for both applications.*

**Response: A Comprehensive Plan Narrative has been submitted for both applications.**

6. Design Criteria Checklist. The design narrative submitted with the application does not adequately address the Design Criteria Checklist (18.07 Appendix 2). IMC 18.04.430(A)(3) establishes that the criteria set forth in the Design Criteria Checklist are applicable to projects requiring a Site Development Permit. Please give the narrative to address each criterion in the Design Criteria Checklist and explain how the site design complies with or otherwise satisfies the intent of the criteria.

*NOTE: Pursuant to IMC 18.07.660(D), compliance with the Design Criteria Checklist is also required for the MSP. Submit the revised narrative for both applications.*

**Response: A Revised Design Criteria Narrative has been submitted for both applications.**

7. Alternative Analysis. Pursuant to IMC 18.07.480(E)(17), the application must establish alternative sites have been considered and the proposed site is best suited for the development. Please provide an alternatives analysis describing the site selection process and the conclusion that the subject property is most appropriate for the project proposal.

**Response: The state of Washington Courts has deemed this an appropriate site for a schoolhouse site and is thus most appropriate for the project proposal. This property was condemned by the school district to use for a schoolhouse site. This process requires a court hearing and judgment in the Washington State Courts. Per RCW 8.16.050, as a requirement for judgment of hearing in favor of the condemnation for the school district they needed to prove "such real estate sought to be taken is required and necessary for the purposes of a schoolhouse site."**



The District worked with a professional real estate broker over a period of years to identify property suitable for the needed schools. King County in 2012 amended the Countywide Planning Policies and prohibited the siting of new schools outside of the Urban Growth Boundary. This action eliminated the District's ability to use an existing land banked 80- acre rural site and effectively eliminated from consideration for future schools roughly 70% of the District's land area (65,000 acres total, of which 22,000 is designated urban). The District's broker determined that, of the 22,000 acres within the Urban Growth Boundary, the available acreage drops to only a few hundred acres after deducting for sensitive areas, developed and fully utilized properties, publicly held properties (Community Facilities, Parks), and other development constraints (restricted utility extensions, isolated small acreage, etc.). The District's broker searched extensively throughout the District's urban area, focusing on all available developable land in locations near school populations and identified service area needs. He estimates reviewing close to 700 acres of potentially workable school sites and then, after eliminating some of those parcels based upon development constraints, conducted a more focused review of potentially viable school sites. The broker's work considered the City's compact schools guidelines and, given urban land constraints, nontraditional and smaller sites. The Project site was the only viable site within the urban area of the District for a high school program and, at that time, was being marketed for development at its highest best use of approximately 140 single family homes. The proposed project site is located in the correct area based on the regional needs of the district. The site is also a suitable size for both an elementary school and high school. The project design team has spent countless hours developing a site plan that we believe meets the needs of the district while also meeting jurisdictional requirements.

8. Build-To Line. Pursuant to IMC 18.07.480(E)(2)(a), footnote 6, the build-to line is the required placement of the buildings on the street frontage (including private street edges if there is no right-of-way). The schools are shown adjacent to parent and bus drop-off lanes that do not appear to function as public or private roads that would satisfy the build-to-line street frontage requirement. The drop-off lanes are noticeably different in design and character from the main entry road and do not appear to share the same quality of experience.

In meetings with your team, the City provided suggestions to revise the drop-off lanes to appear as roads to emphasize the academic function of the site upon entry to prioritize nonmotorized modes of travel, and to create and maintain a consistently high-quality experience to users of the site. These suggestions do not appear to have been incorporated into the project design.

Please revise the site plan/drop-off lane design to meet the build-to line requirements. You may also submit new or revised narrative explain how the revised site design meets the requirements and tent of the build-to line. Alternatively, you may submit an Administrative Adjustment of Standards for the current proposal.

**Response: As previously discussed, this site has topographic and access challenges that make constructing the school along the only road frontage for the site impractical and a safety concern for students. The project proposes to construct onsite access roads leading to both schools' front doors. These access**



**roads will be constructed with elements similar to a public road to include asphalt roadways, curb, gutter, landscape strip with street trees, and sidewalks. The sites have also been revised to remove parking from these access areas and add additional landscape buffering where feasible.**

### Master Site Plan

9. Accessory Structures. Pursuant to IMC 18.07.660(F)(10), accessory structures must be designed as a component of the overall project design and must provide uniformity and linkage through the site. Additional information on accessory structures is required, including (but not limited to) the following accessory structures identified on the site plan: batting cages, portable toilets, bleachers, score box, and future portable classroom buildings.

**Response: An additional sheet, L1.11 LU, has been added to provide more information regarding accessory structures throughout the site. Unifying elements across the site are a palette of building and planting materials. These design elements are incorporated in and around buildings and accessory structures throughout the site and create elements of continuity that tie the structures across the entire site into a cohesive design.**

10. Signage. Pursuant to IMC 18.07.660 (F)(13), project signage must have consistent elements that maintain uniformity throughout the project. Please provide information such as sign details to determine consistency with this criterion.

**Response: The revised plans that have been resubmitted provide additional details on site signage. Callouts for signage are added to sheets C1.0 and details on sheet G1.03.**

If you have any questions, please call me at (253) 383-2422.

Sincerely,

Todd Sawin, PE  
Principal

JLI/TCS

c: Tom Mullens and Royce Nourigat, Issaquah School District  
Jean Stolzman, Bassetti Architects